REMARKS/ARGUMENTS

Claims 1, 3, 4, 6 and 8-11 now stand in the application, claims 1, 3, 6 and 8 having been amended, claims 2 and 7 having been canceled and rewritten in independent form as claims 9 and 11, respectively, and new claim 10 having been added which corresponds to claim 4 but depends from new claim 9. Reconsideration and favorable action is respectfully requested in view of the above amendments and the following remarks.

In the Office Action, the Examiner has rejected claims 1-8 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. More particularly, the Examiner pointed out that certain of the previously filed amendments are not adequately supported in the specification. As noted above, Applicants have amended claims 1 and 6 in order to correct this deficiency by obviating the objected to language. In addition, newly added independent claims 9 and 11 have been drafted without this deficiency. Accordingly, the Examiner's § 112, second paragraph, rejection of the claims is believed to have been overcome.

The Examiner has rejected claims 1, 4 and 6 under 35 U.S.C. § 103(a) as being unpatentable over Massarsky in view of Ramm et al. ("Ramm"). Thus, no art has been applied against dependent claims 2-3 and 7-8. Applicants respectfully traverse the Examiner's § 103 rejection of these claims.

The Examiner admits that Massarsky fails to disclose "determining a caricature level value in dependence on <u>an intended size of the caricatured image to be</u>

generated." However, Applicant respectfully submits that Ramm also fails to remedy this deficiency.

Firstly, Ramm is in a completely different field from Applicant's invention and Massarsky. Ramm relates to automated cell screening and drug recovery. While Ramm does include a digital imaging system, the imaging is very specific to the extent that a person of ordinary skill would not even consider it "obvious to try" and adapt Massarsky using Ramm. Indeed, there is no teaching, suggestion or motivation to combine the two documents.

Moreover, paragraph [0171] of Ramm cited by the Examiner simply states that it "applies NDF [nonlinear diffusion filtering] methods to remove noise, while relevant image features are enhanced in a fashion dependent upon their shape and size." This has nothing to do with "determining a caricature level value in dependence on an intended size of the caricatured image to be generated" as required by independent claims 1 and 6.

Thus, it should be clear that a person of ordinary skill would not have considered it obvious to combine the teachings in Massarsky and Ramm at the time of Applicant's invention and, even assuming *arguendo* that the references were combined Applicant's invention still would not have resulted. More particularly, independent claims 1 and 6 require that the caricature level is determined by the image to be generated, i.e., an output image and not an input image. Ramm teaches noise filtering at a feature level based on the input image (containing the noise), whereas in claims 1 and 6 the caricature level is associated with the generated, or output, image.

This is an important feature of Applicant's invention which advantageously generates caricatured images that enhance recognition, so that typically a small caricatured image has a greater level of caricaturing than a larger image, and thus helps increase recognizance of smaller images (see page 2, lines 28-32; page 3, lines 5-11; and page 7, line 27 – page 8, line 2). Accordingly, independent claims 1 and 6 and their respective dependent clams patentably define over the cited art taken singly or in combination.

Finally, dependent claims 2 and 7 have been rewritten as independent claims 9 and 11, respectively. No art has been applied against these claims and the 35 USC 112 deficiency pointed out by the Examiner has been corrected. These claims define an inverse relationship between the caricature level and the intended size of the caricatured image to be generated which is not taught or suggested by the prior art. Accordingly these claims and their respective dependent claims 3, 8 and 10 also patentably define over the cited art taken singly or in combination.
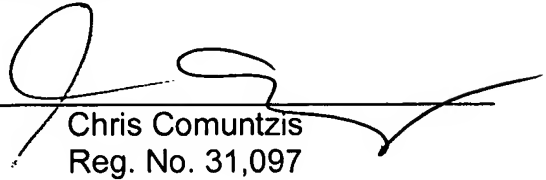
Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 1, 3, 4, 6 and 8-11, now standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

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Respectfully submitted,

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